

REMARKS

After entry of this amendment, claims 1-2, 5-17, and 33-49 remain pending. In the present Office Action, claims 1-2, 5-17, and 33-49 were rejected under 35 U.S.C. § 102(e) as being anticipated by Coile et al., U.S. Patent No. 6,061,349 ("Coile"). Applicant respectfully traverses this rejection and requests reconsideration.

Claims 1-2, 5-17, and 33-49

Applicant respectfully submits that each of claims 1-2, 5-17, and 33-49 recites a combination of features not taught or suggested in the cited art. For example, claim 1 recites a combination of features including: "the second application sending the communication to the first port; a first application requesting the communication from the first port; translating the first port in the request for the communication from the first application to the second port; and delivering the communication to the first application from the second port".

The present Office Action maintains the rejection of claims 1-2 and 5-17 from the previous Office Action, mailed March 29, 2004, in the present application. Applicant continues to disagree with the rejection, and further illustrates Coile's lack of anticipation below.

The present Office Action responds to Applicant's arguments presented in the response mailed May 10, 2004 (and received in the PTO on May 12, 2004). The response to arguments begins on page 10 of the present Office Action. Generally, the response to arguments alleges that the client interface of the outside (external) client in Coile corresponds to the second application and that the port address of the packet interceptor is the first port (see Office Action, page 11, lines 4-7). Additionally, the response to arguments alleges that the client inside the private network corresponds to the first application (see Office Action, page 11, second paragraph). Applicant assumes that the Office Action is referring to Coile's servers here, since that is how Coile refers to the devices inside the private network for the most part. The Office Action further appears to

allege that the address of the client inside the private network corresponds to the second port (see Office Action, page 11, last paragraph extending to page 12).

Applicant respectfully submits that, even given the above interpretation, Coile still fails to teach or suggest the combination of features recited in claim 1. For example, Coile's servers do not request packets from the port address of the packet interceptor that is used by the external clients. Instead, Coile teaches: "Physical machine 210 is able to handle packets intended for each of the virtual machines implemented on physical machine 210 because those packets all have destination addresses translated by Local Director 200 to be y.y.y.1, the IP address of physical machine 210. Each of the port numbers requested by the client are likewise translated to an individual port on physical machine 210 that implements the appropriate daemon for the client requested port number." (Coile, col. 6, lines 43-50). Accordingly, Coile's servers appear to communicate using their own IP address and ports. This does not teach or suggest "a first application requesting the communication from the first port" if the first port is the port on the packet interceptor that is used by the external clients. Furthermore, this does not teach or suggest "translating the first port in the request for the communication from the first application to the second port". Again, Coile's servers use their own IP address and port number to communicate with the director 200, not the address/port used by the external clients (alleged to be the first port in the above analysis from the Office Action).

As highlighted in the previous Response, Coile teaches a "Local Director 200 contains a packet interceptor 204 which intercepts packets containing certain destination IP addresses and port numbers. An address and port number translator 206 replaces the destination IP address and destination port number in the packets with the address and port number of a physical machine 210 which implements the virtual machine that corresponds to the destination IP addresses specified by the client on network communication line 202." (Coile col. 5, lines 28-35). Coile further teaches "Outbound packets from physical machine 210 are intercepted by a packet interceptor 218 and the source IP address and port number of those packets is translated by an address and port number translator 220. Packet interceptor 218 and port number translator 220 use

connection database 212 to find correct virtual IP address and port number to replace the IP address and port number of physical machine 210 as the source IP address and port number of the packet. Thus, not only is the connection requested by a client to a virtual machine redirected without the client's knowledge to physical machine 210, but the returned packets from physical machine 210 are altered so that it also appears to the client that the return packets are sent from the virtual machine which the client attempted to access." (Coile, col. 6, lines 28-42). Thus, Coile teaches a local director 200 that translates a virtual IP address and virtual port number from a client packet to the server's IP address and port number. Server packets include the server IP address and port number, which the local director 200 maps to the virtual IP address and virtual port number for packets sent to the client. The server uses its own IP address and port number, presumably unaware of the virtual IP address and virtual port number. The clients use the virtual IP address and virtual port number, unaware of the server's IP address and port number.

None of the above teaches or suggests: "the second application sending the communication to the first port; a first application requesting the communication from the first port; translating the first port in the request for the communication from the first application to the second port; and delivering the communication to the first application from the second port" as recited in claim 1. For at least the above stated reasons, Applicant submits that claim 1 is patentable over the cited art. Claims 2 and 5-17, being dependent from claim 1, are similarly patentable over the cited art for at least the above stated reasons. Each of claims 2 and 5-17 recite additional combinations of features not taught or suggested in the cited art.

Claim 33 recites a combination of features including: "receiving the communication on the first port from the second application; receiving a request for the communication from a first application, the request including an indication of the first port; translating the first port in the request for the communication from the first application to the second port; and delivering the communication to the first application from the second port". The teachings of Coile, highlighted above, do not teach or suggest

the above highlighted features of claim 33 either. For at least the above stated reasons, Applicant submits that claim 33 is patentable over the cited art. Claims 34-44, being dependent from claim 33, are similarly patentable over the cited art for at least the above stated reasons. Each of claims 34-44 recite additional combinations of features not taught or suggested in the cited art.

Claim 45 recites a combination of features including: "the second application is configured to send the communication to the first port; the first application is configured to request the communication from the first port; the first computer is configured to translate the first port in the request for the communication from the first application to the second port; and the first computer is configured to deliver the communication to the first application from the second port". The teachings of Coile, highlighted above, do not teach or suggest the above highlighted features of claim 45 either. For at least the above stated reasons, Applicant submits that claim 45 is patentable over the cited art. Claims 46-49, being dependent from claim 45, are similarly patentable over the cited art for at least the above stated reasons. Each of claims 46-49 recite additional combinations of features not taught or suggested in the cited art.

Information Disclosure Statement (IDS)

Applicant filed an electronic IDS and a corresponding mailed IDS with the response on May 10, 2004. However, Applicant did not receive the PTO-1449 forms for these IDSs in the present Office action, initialed and signed by the Examiner to evidence consideration of the references cited therein. Applicant has attached hereto, as Exhibit A, a copy of the IDSs filed on May 10, 2004. Applicant respectfully requests consideration of the references and return of the PTO-1449 forms, initialed and signed by the Examiner to evidence such consideration. Applicant also files herewith an additional IDS.

CONCLUSION

Applicant submits that the application is in condition for allowance, and an early notice to that effect is requested.

If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-22600/LJM.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'LJ Merkel', is written over a horizontal line.

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